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FILED
APR 18 2025
U.S. MAGISTRATE JUDGE
BY _____

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ISMAEL PEREZ-REYES
aka "Jesus Cisneros,"

Defendant.

Case No. 2:25-MJ- 328 -MDC

CRIMINAL COMPLAINT
for violation of Deported Alien
Found in the United States
(8 U.S.C. § 1326(a) and (b))

BEFORE the Honorable Maximiliano D. Couvillier, III, United States Magistrate
Judge, Las Vegas, Nevada, the undersigned Complainant, being duly sworn, deposes and
states:

COUNT ONE

Deported Alien Found in the United States
(8 U.S.C. § 1326(a) and (b))

On or about March 30, 2025, in the State and Federal District of Nevada,

ISMAEL PEREZ-REYES,
aka "Jesus Cisneros,"

defendant herein, an alien, was found in the United States after having been deported and
removed therefrom on or about December 7, 2022 and November 8, 2023, having reentered

1 and remained in the United States, and not having obtained the express consent of the
2 Attorney General of the United States or the Secretary of Homeland Security to reapply for
3 admission to the United States, in violation of 8 U.S.C. § 1326(a) and (b).

4 **PROBABLE CAUSE**

5 I, Raymond Thayer, state the following as and for probable cause.

6 1. I have been employed with the United States Department of Homeland
7 Security ("DHS"), Immigration and Customs Enforcement ("ICE"), as an Immigration
8 Enforcement Agent and Deportation Officer ("DO") since February 2007. I am currently
9 assigned as a DO to the Las Vegas Office's Enforcement and Removal Operations
10 Criminal Prosecution's Section. In this capacity, I investigate and process a range of
11 immigration related offenses mainly focusing on obtaining federal prosecutions and
12 indictments for violent criminal aliens, such as violations of 8 U.S.C. §§ 1325 and 1326.

13 2. This Affidavit is made in support of a criminal complaint against ISMAEL
14 PEREZ-REYES ("Defendant"), also known as Jesus Cisneros, for a violation of 8 U.S.C.
15 § 1326(a) and (b), Deported Alien Found in the United States. The information contained
16 in this Affidavit is based on my own personal investigation and information communicated
17 to me by other law enforcement officers with personal knowledge of facts relevant to this
18 investigation. The Affidavit is intended only to show that there is probable cause for the
19 requested complaint and does not purport to set forth all of my knowledge of, or
20 investigation into, this matter.

21 3. On March 30, 2025, ICE learned that Defendant had been arrested by Las
22 Vegas Metropolitan Police for Driving Under the Influence and Allow Child
23 Abuse/Neglect, in Las Vegas, Nevada. Because ICE records indicated Defendant is a
24 citizen and national of Mexico, by virtue of birth, who was previously removed from the

1 United States and because Defendant was not in possession of valid immigration documents
2 allowing him to be present or remain in the United States, ICE opened an investigation. On
3 March 31, 2025, Defendant was remanded to ICE custody from the Clark County
4 Detention Center, based on an immigration detainer.

5 4. On or about March 31, 2025, I reviewed printouts from the Federal Bureau
6 of Investigation ("FBI") relating to Defendant. Based on my training and experience, I
7 know that the FBI databases contain records of arrests and convictions of individuals,
8 based on an individual's FBI number. I also know that an FBI number is assigned based on
9 unique fingerprint characteristics, and that police departments routinely fingerprint each
10 person who is booked into custody for identification purposes and inclusion into criminal
11 history databases.

12 5. A query of Defendant's automated criminal history confirmed that he had
13 been convicted of the following felonies prior to his most recent removal, which subject him
14 to the heightened penalty provisions of 8 U.S.C. § 1326(b):

15 a. On or about September 27, 2022, Defendant was convicted of
16 Possession or Use of a Controlled Substance in a Correctional Facility, in violation of Utah
17 Code Section 58-37-8(2)(a)(i) and 2(e), in the District Court, Washington County, Utah,
18 Case No. 221501068.

19 b. On or about October 4, 2023, Defendant was convicted in the United
20 States District Court for the District of Utah, in case number 4:23-cr-00060-DN-1, of Illegal
21 Reentry After Deportation, in violation of 8 U.S.C. § 1326(a) and (b).

22 6. On or about March 31, 2025, I obtained the DHS Administrative File ("A-
23 File") for the subject assigned Alien Registration Number 240 074 422, whose name of
24 record is "Ismael Perez-Reyes" (hereinafter, the "Perez-Reyes A-File"). Based on my

1 training and experience, I know that a DHS A-File is a file maintained by DHS in which
2 immigration records are maintained for an alien admitted to, or found in, the United States.
3 I also know that a DHS A-File usually contains photographs, fingerprints, court records of
4 conviction, and all records relating to deportation or other actions by DHS – or its
5 predecessor, the Immigration and Naturalization Service (“INS”) – with respect to the
6 subject alien for whom the DHS A-File is maintained. As discussed in more detail below,
7 my review of the Perez-Reyes A-File confirmed that this A-File corresponds with
8 Defendant.

9 7. The Perez-Reyes A-File contained the following documents and information,
10 among other things, regarding Defendant’s immigration status:

11 a. Executed Warrants of Removal / Deportation (ICE Forms I-205)
12 indicating that Defendant was officially removed and deported from the United States to
13 Mexico on or about December 7, 2022, and November 8, 2023. I know from my training
14 and experience that a Warrant of Removal / Deportation (ICE Form I-205) is executed
15 each time a subject alien is removed from the United States by ICE (and in the past by its
16 predecessor agency, the INS) and usually contains the subject’s photograph, signature, and
17 / or fingerprints. The executed Warrants of Removal / Deportation (ICE Forms I-205)
18 referenced above that I found in the Perez-Reyes A-File contains Defendant’s photograph,
19 signature, and fingerprints.

20 b. A Record of Deportable / Inadmissible Alien (Forms I-213s) dated
21 October 9, 2022, October 17, 2023, and March 31, 2025, all state that Defendant is a native
22 and citizen of Mexico.

1 c. Record of sworn statement dated March 31, 2022, where the
2 Defendant admits he is a native and citizen of Mexico who illegally entered the United
3 States.

4 d. Defendant's Mexican Birth Certificate.

5 8. On or about March 31, 2025, I reviewed certain printouts of ICE computer
6 indices contained in the Perez-Reyes A-File. Based on my training and experience, I know
7 that ICE computer indices track and document each time an alien has been deported from
8 the United States by ICE (or previously by the INS) or was granted permission to enter or
9 re-enter the United States. The ICE computer indices confirmed that Defendant had been
10 removed and deported on or about the dates indicated on the Warrants of Removal /
11 Deportation (ICE Forms I-205) found in the Perez-Reyes A-File.

12 9. Based on my review of the Perez-Reyes A-File, I determined that it does not
13 contain any record of him ever having received permission from the Attorney General or his
14 designated successor, the Secretary of Homeland Security, to legally re-enter the United
15 States. Based on my training and experience, I know that such documentation is required to
16 re-enter the United States legally after deportation and that, if such documentation existed,
17 it would ordinarily be found in the Perez-Reyes A-File.

18 10. Based on my training, experience, and review of the contents of the Perez-
19 Reyes A-File, in particular the Warrants of Removal / Deportation, which indicate that
20 Defendant had been deported to Mexico, I determined that Defendant is an alien – that is, a
21 citizen of Mexico.

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1 11. Based on the above, I believe there is probable cause that ISMAEL PEREZ-
2 REYES did violate 8 U.S.C. § 1326(a) and (b) (Deported Alien Found in United States).

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4 
Raymond Thayer, Deportation Officer
Immigration and Customs Enforcement

5
6 Sworn and subscribed before me on this 18th day of April 2025.

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8 
HON. MAXIMILIANO D. COUVILLIER, III
UNITED STATES MAGISTRATE JUDGE
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